1	JEFFREY S. RUGG, ESQ.		
2	Nevada Bar No. 10978 Brownstein Hyatt Farber Schreck, LLP 100 North City Parkway, Suite 1600 Las Vegas, Nevada 89106-4614 Telephore (702) 282 2101		
3			
4	Telephone: (702) 382-2101 Fax: (702) 382-8135		
5	Email: jrugg@bhfs.com Attorneys for Defendant Volkswagen Group of America, Inc.		
6			
7			
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10			
11	ADAM SCHWARTZ, individually and on	CASE NO.: 2:15-cv-1980-JCM-VCF	
12	behalf of all others similarly situated, Plaintiff,		
13	·	STIPULATION AND ORDER	
14	v. VOLKSWAGEN GROUP OF AMERICA,		
15	INC., A New Jersey Corporation,		
16	Defendant.		
17			
18	Pursuant to Local Rule 7-1, Defendant Volkswagen Group of America, Inc. ("VWGoA").		
19	through its counsel, Brownstein Hyatt Farber Schreck, LLP, and Plaintiff Adam Schwartz		
20	("Plaintiff") by and through his counsel, Lynch, Hopper, Salzano & Smith, LLP, and hereby		
21	stipulate as follows:		
22	1. This action was commenced by the filing of a complaint on October 13, 2015.		
23	2. The time to respond has not expired.		
24	3. Plaintiff has informed VWGoA that he intends to file an amended complaint and		
25	that it is not necessary for VWGoA to respond to the current complaint.		
26			
27			
28			
	018090\0006\13783180.2	1	

	1	WHEREFORE, the parties hereby stipulate and respectfully request that the Court enter		
	2	an Order extending the time for VWGoA to answer of otherwise respond to the Complaint to		
	3	permit Plaintiff time to file an Amended Complaint.		
	4			
	5	Dated: November 9, 2015	Dated: November 9, 2015	
	6	/s/ leffrey S-Rugg	/s/ Charles "Dee" Hopper	
	7	<u>/s/ Jeffrey S. Rugg</u> JEFFREY S. RUGG, ESQ. Nevada Bar No. 10978	Charles "Dee" Hopper, Esq. (NV Bar No. 6346) Sergio Salzano, Esq. (NV Bar No. 6482)	
	8	Brownstein Hyatt Farber Schreck, LLP 100 North City Parkway, Suite 1600	LYNCH, HOPPER, SALZANO & SMÍTH, LLP	
	9	Las Vegas, Nevada 89106-4614	1640 Alta Drive, Ste. 11 Las Vegas NV 89106	
LLP	10	Attorneys for Defendant Volkswagen Group of America, Inc., A New Jersey Corporation		
ECK,	11			
SCHR 1600 4	12	<u>ORDER</u>		
HYATT FARBER (North City Parkway, Suite 1 Las Vegas, NV 89106-4614 702.382.2101	13	IT IS SO ORDERED.	(antalo)	
TT FA City Park gas, NV 702.382.	14		Cancella	
HYA North C Las Ve	15	UNITED STATES MAGISTRATE JUDGE		
BROWNSTEIN HYATT FARBER SCHRECK, LLP 100 North City Parkway, Suite 1600 Las Vegas, NV 89106-4614 702.382.2101	16	CASE	NO.: 2:15-cv-01980-JCM-VCF	
ROWI	17	D A TE	November 9, 2015	
æ	18	DATE	l:	
		Submitted by:	IT IS FURTHER ORDERED that the	
	19	<u>/s/ Jeffrey S. Rugg</u> JEFFREY S. RUGG, ESQ.	Amended Complaint must be filed by November 23, 2015.	
	20	Nevada Bar No. 10978	6) 1.0.0mber 20, 2010.	
	21	Brownstein Hyatt Farber Schreck, LLP 100 North City Parkway, Suite 1600		
	22	Las Vegas, Nevada 89106-4614 Telephone: (702) 382-2101		
	23	Fax: (702) 382-8135 Email: jrugg@bhfs.com		
	24	Attorneys for Defendant Volkswagen Group of America, Inc.		
	25			
	26			
	27			
	28			
		018090\0006\13783180.2	2	